



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

November 2, 2020

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2015-0013; Registration Reviews Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Metconazole

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessments of metconazole and the critical role this chemistry provides to the success of a number of Arizona's agricultural crops, including corn, barley, wheat and alfalfa.

According to data provided by the Arizona Pest Management Center, metconazole is primarily used in field corn production and to a lesser extent in alfalfa, barley and wheat. In field corn and alfalfa production metconazole is used for overall plant health and to enhance yields. In barley and wheat production metconazole is used to treat rust diseases, which affects grain plants by damaging the grain and thus reducing yields. Metconazole is also used to some extent in Bermudagrass to control rust.

The overall usage of metconazole in the crops noted above is only a small percentage of the total crop acres on an annual basis. With respect to wheat and barley metconazole usage tends to fluctuate annually based on production levels which increase and decrease based on crop market conditions. However, overall, these crops play an important economic role in the state's overall agricultural production. According to USDA National Agricultural Statistic Service, in 2019, Arizona produced 280,000 acres of alfalfa valued at \$476 million, 15,000 acres of barley valued at \$7.4 million, and 35,000 acres of wheat valued at \$22.4 million. There were 50,000

acres of field corn produced in Arizona in 2019.¹ Although the value of this product is not reported by USDA, field corn is used for corn silage, an important feed ingredient for dairy cows. Milk production in Arizona was valued at \$853 million in 2019.

Retaining the use of metconazole is also critical for the role it plays as a component of a fungicide resistance program. Fungi are adaptable organisms and can become resistant to fungicides. Ensuring metconazole continues to be available is important for maintaining a robust fungicide resistance management program.

Metconazole is an important crop protection tool for many growers in our state and has been used for many years without evidence of an unreasonable risk to humans or environmental health. The Arizona crops on which metconazole is used benefit from its availability for crop protection and resistance management, and would be negatively impacted if it were no longer available or if major restrictions were implemented on its use. For those reasons, we urge the EPA to continue to allow its use.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

¹ USDA-NASS. 2020. 2019 State Agriculture Overview. United States Department of Agriculture, National Agricultural Statistics Service. Accessed at:
https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=ARIZONA